UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JONATHAN COBB

               Plaintiff,

                    v.   Case No. 1:08-CV-0483 (MHS)

GOOGLE INC. and
WORKFORCE LOGIC LLC,

               Defendants.

JOINT PRELIMINARY REPORT AND DISCOVERY PLAN

1. **Description of Case:**

    (a)   <u>Describe briefly the nature of this action.</u>

        Plaintiff Jonathan Cobb has brought Georgia state law claims for (1) misappropriation, (2) fraud and fraudulent inducement, (3) conspiracy to commit fraud and fraudulent inducement, (3) unjust enrichment/implied contract, and (4) conversion. Defendants deny the allegations and any liability to Mr. Cobb.

    (b)   <u>Summarize, in the space provided below, the facts of this case. The summary should not be argumentative nor recite evidence.</u>

        (1)   *Plaintiff's Presentation of the Facts (Submitted by Plaintiff Only)*

        Beginning in 2006, Plaintiff Jonathan Cobb worked in Georgia as a contractor through Workforce Logic LLC, providing services for the benefit of Google Inc. Responding to the stated interest of Google Inc. in encouraging and rewarding the submission of innovative ideas and refinements to its programs and services, Plaintiff convened an internal Google e-mail discussion group in which

SCHEDULING ORDER

Upon review of the information contained in the Joint Preliminary Report and Discovery Plan form completed and filed by the parties, the court orders that the time limits for adding parties, amending the pleadings, filing motions, completing discovery, and discussing settlement are as set out in the Federal Rules of Civil Procedure and the Local Rules of this court, except as herein modified and except as set forth in the following schedule:

Event/Filing	**Deadline**
Plaintiffs' Expert Disclosures & Report	October 10, 2008
Defendants' Expert Disclosures & Report	October 17, 2008
Rebuttal Expert Disclosures & Report	November 14, 2008
Close of Discovery	December 29, 2008 (*i.e.*, 8 months after discovery opens)
Motions for Summary Judgment	February 6, 2009
Oppositions to Summary Judgment	February 27, 2009
Reply Briefs re: Summary Judgment	March 13, 2009

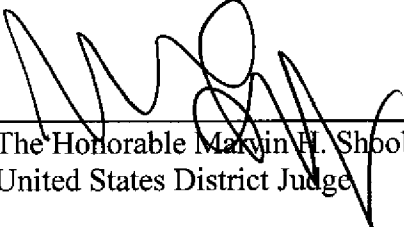| Motions Objecting to Expert Testimony (Daubert Motions)	21 calendar days after Court's adjudication of summary judgment motions
Joint Pretrial Order	21 calendar days after adjudication of the parties' summary judgment motions, or 21 calendar days after adjudication of the parties' Daubert motions, whichever is later.

IT IS SO ORDERED, this _____ day of _____, 2008.

_____
The Honorable Marvin H. Shoob
United States District Judge

Submitted and consented to on May 5, 2008, by:

/s/ Michael A. Dailey
Michael A. Dailey
ANDERSON DAILEY LLP
2002 Summit Boulevard
Suite 1250
Atlanta, Georgia 30319
404-442-1800
404-442-1820 (facsimile)
mdailey@andersondailey.com

/s/ Gary Hill
Gary Hill
HILL AND BLEIBERG
47 Perimeter Center
Atlanta, Georgia 30346
770-394-7800
ghill@hillandbleiberg.com

/s/ Joan Dillon_____
Joan Dillon
JOAN DILLON LAW LLC
3522 Ashford Dunwood Road
PMB 235
Atlanta, Georgia 30319
404-257-1708
joan@joandillonlaw.com

Attorneys for Plaintiff Jonathan Cobb

/s/ Eric P. Schroeder_____
Eric P. Schroeder (Georgia Bar No. 629880)
R. Joseph Burby, IV (Georgia Bar No. 094503)
John C. Bush (Georgia Bar No. 413159)
POWELL GOLDSTEIN LLP
One Atlantic Center
Fourteenth Floor
Atlanta, Georgia 30309
(404) 572-6600
(404) 572-6999
eschroeder@pogolaw.com

/s/ Michael A. Zwibelman_____
Laurie Edelstein (Admitted *Pro Hac Vice*)
Michael A. Zwibelman (Admitted *Pro Hac Vice*)
David Ziff (Admitted *Pro Hac Vice*)
BRUNE & RICHARD LLP
235 Montgomery Street
Suite 1130
San Francisco, CA 94104
(415) 563-0600
(415) 563-0613 (facsimile)
mzwibelman@bruneandrichard.com

Attorneys for Defendant Google Inc.

/s/ Charlotte K McClusky
Charlotte K. McClusky (Georgia Bar No. 484223)
John C. Fish (Admitted *Pro Hac Vice*)
Ronald D. Arena (Admitted *Pro Hac Vice*)
LITTLER MENDELSON, P.C.
3348 Peachtree Road, N.E.
Suite 1100
Atlanta, Georgia 30326-1008
(404) 233-0330
(404) 233-2361 (facsimile)

Attorneys for Defendant Workforce Logic